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September 23, 2020

VIA ECF

Hon. Vernon S. Broderick
United States District Court
Southern District of New York
40 Foley Square
New York, NY 10007

Re: **Clifford, et al. v. Tron Foundation, et al., No. 1:20-cv-02804-VSB**

Dear Judge Broderick:

We represent Defendants TRON Foundation (“TRON”) and Justin Sun. We are writing to provide information pertaining to plaintiffs’ September 16, 2020 letter in this case informing the Court that they are seeking to coordinate *Lee, et al. v. Binance, et al.*, 1:20-cv-02803-ALC, pending before Judge Carter, with nine other actions pending in the Southern District of New York (including this action). ECF No. 34. Plaintiffs filed similar letters in each of the cases that they seek to coordinate. TRON and Mr. Sun opposed plaintiffs’ request to coordinate in a letter dated September 21, 2020. ECF No. 39. Plaintiffs filed a response on September 22, 2020. ECF No. 43.

Defendants in several of the other cases also opposed coordination. On September 23, 2020, Judges presiding over two of the other actions that plaintiffs seek to coordinate denied plaintiffs’ request to coordinate. Judge Preska denied coordination in *Williams v. Quantstamp, Inc., et al.*, 1:20-cv-02813-LAP on the grounds that “common counsel and a common plaintiff and perhaps even common legal issues do not necessarily make a case appropriate for coordination.” Judge Hellerstein denied coordination in *Holsworth v. BProtocol Foundation, et al.*, 1:20-cv-02810-AKH on the ground that “[c]oordination because of possible similarity of questions of law is inappropriate.” A copy of Judge Preska and Judge Hellerstein’s decisions are attached as Exhibits A and B, respectively.

Respectfully,

FENWICK & WEST LLP

/s/ Dean S. Kristy

Dean S. Kristy (NY Bar #1945658)

CERTIFICATE OF SERVICE

I, the undersigned, hereby certify that a true and correct copy of the foregoing was served via the CM/ECF system on the individuals listed below on September 23, 2020:

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